

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re:

William R. Citeroni
Debtor(s)

Huntingdon National Bank
Movant(s)

v.

William R. Citeroni and Marie Cornman
Respondent(s)

Bankruptcy No. 18-70832-JAD

Chapter 13

Document No.

**RESPONSE TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY AND CO-
DEBTOR STAY**

AND NOW, comes the Debtor(s), William R. Citeroni by and through his attorney, Corey J. Sacca, Esquire and Bononi & Company, P.C., who files this Response to Motion for Relief of the Automatic Stay and responds as follows:

1. Debtor and Co-Debtor are obligated under the terms of the Personal Loan Agreement dated November 6, 2015.
2. Under the current proposed plan, Debtor proposed to pay the loan of Movant outside of the Chapter 13 Plan.
3. Debtor intends to amend his Chapter 13 Plan to include the payment Movant's claim.
4. Debtor's current proposed plan, proposes a payment of \$8,000.00 per month. Debtor has made his first 4 payments under the plan. Debtor intends to also make his fifth payment this month.
5. Debtor intends to make direct payments to bring the account current and will incorporate the payments into the new amended plan to be filed.

6. Debtor and Co-Debtor misunderstood their payment obligations under the plan and outside of the plan.
7. Movant will be adequately protected while payments are being made through the plan, as Debtor has remained current on his payments.
8. Further, the vehicle's value, based on Debtor's schedules has a value in excess of the outstanding lien of Movant.

WHEREFORE, it is respectfully requested that this Honorable Court deny Movant's request for Relief of Stay as to Debtor and Co-Debtor.

Respectfully submitted,

Dated: May 18, 2019

/s/ Corey J. Sacca
Corey J. Sacca, Esquire
PA ID 306741
Bononi & Company, P.C.
20 North Pennsylvania Ave.
Greensburg, PA 15601
724-832-2499
csacca@bononilaw.com